

FILED
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2006 MAY 19 P 3:39

U.S. DISTRICT COURT
DISTRICT OF MASS.

United States District Court
District of Massachusetts

04-12099-GAO

**ALICE COOPERSTEIN, EXECUTOR
OF THE ESTATE OF SHERWIN
COOPERSTEIN AND ALICE COOPERSTEIN** : **CIVIL ACTION NO.
SUCV2005-02032**

VS. :

**ROBERT DAVIS, M.D. AND
CAPE COD HEALTH CARE, INC.** : **MAY 16, 2006**

AMENDED INITIAL DISCLOSURE OF THE PLAINTIFFS

The plaintiffs, Alice Cooperstein, as Executor of the Estate of Sherwin Cooperstein, and Alice Cooperstein, individually, make the following initial disclosure in compliance with Fed. R. Civ. P. Rule 26(a):

(1) Initial Disclosures:

(A) The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses.

1. Alice Cooperstein – Plaintiff
10 Hillsboro Drive
West Hartford, CT 06119
(860) 561-19270
2. Dr. Lawrence Cooperstein

Pittsburgh, PA
Family member and fact witness

3. Dr. Rhonda Cooperstein
Madison, NJ
Family member and fact witness
4. Dr. Dudley Watkins
c/o University of Connecticut Health Center
Farmington, CT
Colleague and fact witness
5. Custodian of Records - Defendant
Falmouth Hospital
Ter Huen Drive
Falmouth, MA 02540
(508) 548-5300

Provided medical treatment to plaintiff's decedent from 6/22/03 - 6/23/03 and on occasions after 6/27/03.

6. Robert Davis, M.D. - Defendant
Falmouth Hospital
Ter Huen Drive
Falmouth, MA 02540
(508) 548-5300

Provided medical treatment to plaintiff's decedent from 6/22/03 - 6/23/03.

7. Custodian of Records
Brigham and Women's Hospital
75 Francis Street
Boston, MA 02115
(617) 732-5500

Provided medical treatment to plaintiff's decedent from 6/23/03 - 6/27/03

8. Custodian of Records
JML Care Center, Inc.
184 Ter Heun Drive
Falmouth, MA 02540

Provided medical treatment to plaintiff's decedent from 6/27/03 – 11/16/04.

9. Charles Zollinger, M.D.
15 Parkman Street, Wang 835
Boston, MA 02114

Provided medical treatment to plaintiff's decedent from 6/23/03 - 6/27/03

10. Devin McManus, M.D.
Falmouth Medical Associates
10 Bramblebush Park
Falmouth, MA 02540

Provided medical treatment to plaintiff's decedent from 6/27/03 – 11/16/04.

11. Stephen H. Greenberg, M.D. - Expert Witness
4104 Southern Pine Court
Columbia, Missouri 65203
(573) 864-9912

Initial written report is dated 5/25/04.

(B) A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody or control of the party and that the disclosing party may use to support its claims or defenses.

1. Falmouth Hospital - medical records and bills dated 6/22/03 - 6/23/03;
2. Brigham and Women's Hospital – medical records and bills dated 6/23/03 - 6/27/03;
3. JML Care Center - medical records and bills from 6/27/03 - 11/16/04;
4. Charles Zollinger, M.D. – medical records and bills dated 6/23/03 - 6/27/03;
5. Devin McManus, M.D. – medical records and bills dated 6/27/03 - 11/16/04;
6. Certified Nursing Assistants – medical records and bills dated 6/27/03-7/3/04 and 8/30/04-9/30/04;
7. Bay Radiology Associates, Inc. – bills dated 6/22/03-9/4/04;
8. Brigham and Women's Physician's Organization – bills dated 6/23/03-6/25/03;
9. Medical Services Ambulance – bill dated 9/4/03;
10. Michael T. Leahy, M.D. – bills dated 7/1/03-7/15/03;
11. Ophthalmic Consultants of Boston, Inc. – bill dated 1/14/04;
12. Falmouth Hospital/Cape Cod Health Care – various radiology and blood work records from 7/01-1/28/04;
13. Report of Stephen H. Greenberg, M.D. dated 5/25/04;
14. Four (4) family photographs taken in 2002;
15. A Letter from Dr. Dudley Watkins, Professor of Cell Biology, dated December 23, 2004;
16. The "Program" from the *Tributes and Class Night* reunion, dated May 19, 2000;
17. The "Founders Tribute" pamphlet;
18. The "dedication" from the UCONN Health Center Alumni, dated May 19, 2000;
19. Enlisted Record of Sherwin Cooperstein;
20. Dr. Cooperstein's Cirriculum Vitae; and
21. Death Certificate of Sherwin Cooperstein.

(C) A computation of any category of damages claimed by the disclosing party.

See attached Schedule of Special Damages.

(D) Any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

N/A

PLAINTIFFS:

ALICE COOPERSTEIN, EXECUTOR
OF THE ESTATE OF SHERWIN COOPERSTEIN
AND ALICE COOPERSTEIN

By _____

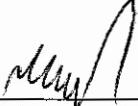


Gerald S. Sack (#ct05279)
Law Offices of Gerald S. Sack
836 Farmington Avenue
West Hartford, CT 06119
(860) 233-8251
gsack@sacklawoffice.com

CERTIFICATION

This is to certify that a copy of the foregoing was mailed on this 16th day of May, 2006 to the following counsel of record:

Tanya Oldenhoff, Esq.
Sloane and Walsh
3 Center Plaza #850
Boston, MA 02108



Gerald S. Sack